

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

BCI Acrylic, Inc.	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	CIVIL ACTION NO.: 2:23-cv-00908-JPS
Milestone Bath Products Inc.	§	
(d/b/a Bellastone Bath Systems) and	§	
TightSeal Exteriors And Bath	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF AARON T. OLEJNICZAK IN SUPPORT OF  
BCI ACRYLIC, INC.'S CIVIL L. R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION  
TO COMPEL DEFENDANTS TO DISCLOSE  
THEIR ANTICIPATION AND OBVIOUSNESS DEFENSES**

I, Aaron T. Olejniczak, declare the following:

1. I am an attorney with the law firm of Andrus Intellectual Property, LLP in Milwaukee, Wisconsin. I represent Plaintiff BCI Acrylic, Inc. in the above-captioned matter. I submit this Declaration in support of BCI's Civil L.R. 7(h) Expedited Non-Dispositive Motion to Compel Defendants to Disclose their Anticipation and Obviousness Defenses.
2. Attached hereto as Exhibit A is a true and correct copy of BCI Acrylic, Inc.'s First Set of Interrogatories to Defendants Milestone Bath Products and Tightseal Exteriors and Bath dated October 5, 2023.
3. Attached hereto as Exhibit B is a true and correct copy of Defendants' Responses and Objections to Plaintiff's First Set of Interrogatories dated November 6, 2023.
4. Attached hereto as Exhibit C is a true and correct copy of emails between counsel.

Executed on November 29, 2023

s/Aaron T. Olejniczak  
Aaron T. Olejniczak (Wis. Bar No. 1034997)